

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtor ¹

Civil. No.: 17-BK-3283-LTS

PROMESA

TITLE III

**OPPOSITION TO THE FIFTY-SIXTH OMNIBUS OBJECTION (NON-SUBSTANTIVE)
OF THE COMMONWEALTH OF PUERTO RICO TO DUPLICATE BOND CLAIMS
[ECF NO. 7286]**

TO THE HONORABLE COURT:

COMES NOW creditor, **Cooperativa de Ahorro y Crédito de Caparra (“Caparra Coop”)**, through the undersigned counsels and respectfully responds in opposition to the Fifty Sixth Omnibus Objection (Non-Substantive) of the Commonwealth Of Puerto Rico To Duplicate Bonds Claims [ECF No. 7286] “the Objection”), and states and prays as follows:

1. The Commonwealth of Puerto Rico (“Debtor”) has objected some of Caparra Coop’s timely filed proof of claims as duplicative.

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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2. Caparra Coop amended one of its original claims, after it was filed in the first place. However, the Fifty-Sixth Omnibus Objection erroneously identifies that amendment as a duplicative claims. The appearing party claims 22203 (Objection No. 38), 23893 (Objection No. 40) and 22340 (Objection No. 41) are included in the objection.

3. Caparra Coop objects the position of the Debtor under the following grounds:

- a. In regard to Claim No. 22203, Objection No. 38: according to our record, this claim was amended by the proof of claim no. 23893. As a matter of fact, both proof of claims were filed on the same day, May 25, 2018. The amendments consisted in a change of the claim to a secured one, under the Constitution of the Commonwealth of Puerto Rico.
 - b. In regard to Claim No. 22340, Objection No. 41: our records reflect that this claim was subsequently amended and superseded by the proof of claim No. 22305, for the same reasons above mentioned.
4. Caparra Coop does not object to the non-substantive disallowance of the duplicative claims it filed against the Commonwealth, contingent on a finding that each of the remaining claims is prima facie valid, pursuant to 11 U.S.C. 502 (a) and be considered as the same claim allowing one of them.

Certificate of service: I hereby certify that on this date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends notification of such filing to all those who in this case have registered for receipt of notice by electronic mail and parties in interest that have filed notices of appearance.

RESPECTFULLY SUBMITTED.

In Bayamón, Puerto Rico, for San Juan, Puerto Rico this 2nd day of July, 2019.

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JIMÉNEZ BREA & ASOCIADOS, PSC

NÉSTOR D. ZAMORA SANTOS, ESQ
MICHAEL R. JIMÉNEZ BREA, ESQ
P.O. Box 6416 Bayamón, PR 00960-5416
Tel. (787) 798-5720
lcdo.nestorzamora@gmail.com
mjimenez@jbalawpr.com

By: S/ Néstor D. Zamora Santos
NÉSTOR D. ZAMORA SANTOS, ESQ.
USDC-PR 303,614

By: S/ Michael R. Jiménez Brea
MICHAEL R. JIMÉNEZ BREA, ESQ.
USDC-PR 300,111

Counsel for the Creditor:
Cooperativa de Ahorro y Crédito Caparra (Caparra Coop)